

August 26, 2021

**VIA ECF**

Hon. Sarah Netburn  
United States District Court for the Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *Global Gaming Philippines, LLC v. Razon Jr., et al.*, No. 21-cv-2655 (LGS)-(SN)

Dear Judge Netburn:

On behalf of all Defendants in the above-captioned matter, we write to request that the Court clarify whether its Order of August 25, 2021 (Dkt. No. 144) that directed the parties to discuss and narrow the issues between the parties applies just to outstanding issues regarding Plaintiff GGP's motions to compel (Dkt. Nos. 109, 110, 112 and 113), which were the subject of the parties' status letters submitted to the Court on August 20 (Dkt. Nos. 142 and 143).

We believe that Defendants' motions to compel (Dkt. Nos. 102, 103 and 104) are now fully briefed (*see* Dkt. Nos. 125, 140, 141) and ripe for decision by the Court. Plaintiff GGP also appears to believe that these motions are now fully briefed. *See* Dkt. No. 137 at 3, ¶ 5.c. And, at the parties' hearing before Your Honor on August 4, the Court indicated that it would rule on Defendants' motions to compel in a forthcoming written decision.<sup>1</sup>

To the extent that the Court intended its Order of August 25 to direct meet and confers between the parties regarding Defendants' motions to compel, Defendants believe that any such meet and confer is likely to be futile as Plaintiff GGP has been thus far unwilling to offer any compromise with respect to the requests that are the subject of those motions to compel.

Sincerely,

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<sup>1</sup> *See* August 4, 2021 Hr'g Tr. 60:15-18 ("THE COURT: . . . I know that there remain the motions that the defendant entities have submitted. I may be able to address that in a written ruling. If not, I will schedule oral argument later on with respect to those applications."). Given that the Defendants submitted reply letters in lieu of oral argument on their motions to compel, *see* Dkt. Nos. 140 and 141, it is Defendants' understanding that the Court will be issuing a written decision on their motions to compel.

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